

DENNIS KERR  
TERRY KERR  
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SPARKS, NEVADA, 89441  
208-520-7266  
PRO-SE PLAINTIFFS

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

DENNIS KERR AND TERRY KERR,

PLAINTIFFS,

-V-

BANK OF AMERICA N.A., ZION BANK  
N.A., NATIONSTAR MORTGAGE LLC,  
TRUSTEE CORPS, SENECA MORTGAGE  
SERVICING LLC, ROBINSON TAIT PS  
AKERMAN LLP NEVADA, AKERMAN LLP  
UTAH, QUINNEY NEBEKER PC, POOR,  
ROTH, ROBINSON, PC, RCO LEGAL PC.

DEFENDANTS.

CASE NO. 3:15-CV-00306-MMD-WGC

AMENDED COMPLAINT

AMENDED COMPLAINT

COMES NOW PLAINTIFFS PRO-SE DENNIS KERR AND TERRY KERR  
WITH THEIR AMENDED COMPLAINT AGAINST DEFENDANTS BANK OF AMERICA  
N.A., ZION BANK N.A., NATIONSTAR MORTGAGE LLC, TRUSTEE CORPS,  
SENECA MORTGAGE SERVICING LLC, ROBINSON TAIT PS, AKERMAN LLP  
NEVADA, AKERMAN LLP, UTAH, QUINNEY NEBEKER PC, POOR ROTH AND  
ROBINSON, PC, AND RCO LEGAL PC.

INTRODUCTION

THIS IS A LAWSUIT ABOUT RACKETEER INFLUENCED AND CORRUPT  
ORGANIZATION VIOLATIONS. THERE IS VIOLATIONS OF THE SERVICE  
MEMBERS CIVIL RELIEF ACT, THERE IS EXTREME EMOTIONAL DISTRESS  
WITH A SMEAR CAMPAIGN OF BELITTLEMENT, DEGRADATION, AND LIBEL

SLANDER. THERE IS A CONSPIRACY BETWEEN THE DEFENDANTS TO DO VIOLATIONS OF DECEPTIVE PRACTICES, AND VIOLATIONS OF CONSUMER PROTECTIONS. THIS CONSPIRACY BETWEEN THE DEFENDANTS WAS TO PURPOSELY ACCOMPLISH A LAWFULL OBJECTIVE IN A UNLAWFULL MANNER. THESE BAD FAITH MISCONDUCT PRACTICES ARE TO DESTROY THE KERR FAMILY, AND EVEN THIER FRIENDS. THERE WAS MAIL FRAUD AND EVEN CLERK OF THE COURT FRAUD. THERE IS A CASH BOUNTY OFFERED FOR THE DEATH OF PLAINTIFF TERRY KERR. THE CEO OF BANK OF AMERICA DID PERSONALLY GO TO IDAHO FALLS, IDAHO AND DID COMPLAIN TO THE SHERIFFS OFFICE ABOUT NOT SERVING THE EVICTION AND THE SALE OF HIS HOUSE FAST ENOUGH. THE CEO BRIAN MONYHAN DID THIS WITH A COUPLE OF LAWYERS AND THE PLAINTIFF TERRY KERR WAS TOLD ABOUT IT. BANK OF AMERICA DID PAY TO HAVE PLAINTIFF TERRY KERR KILLED IN THE ST. VINCENT HOSPITAL IN BILLINGS, MONTANA. HE DID SURVIVE AND DID FILE A LAWSUIT. BANK OF AMERICA DID DO A SETTLEMENT, BUT ST. VINCENT IS STILL NOT SETTLED THE CASE. ALL WILL BE PUT IN THE AMENDED COMPLAINT AS THE JUDGE SAID TO INCLUDE ALL CLAIMS, FACTUAL ALLEGATIONS, DEFENDANTS, AND THE PLAINTIFFS WILL STATE THE TIME, THE PLACE, THE SPECIFIC CONTENT, THE SPECIFIC ACTIONS THE WHO, WHAT, WHY, WHERE, AND ALL DETAILS OF THE VIOLATIONS AS REQUIRED IN 18 USC 1964(C) FOR PERSONS BEING INJURED IN BUSINESS OR PROPERTY BY REASON OF THE VIOLATIONS. THE PLAINTIFFS WILL SHOW THE CONDUCT, OF THE ENTERPRISE THROUGH THE PATTERN OF RACKETEERING KNOWN AS PREDICATE ACTS, CAUSING THE INJURY TO THE PLAINTIFFS BUSINESS AND PROPERTY, AND IDENTIFY WITH FACTS AND EXHIBITS OF PROOF THE SPECIFIC VIOLATIONS AND THE IDENTITIES OF THE PARTIES THAT DID THE VIOLATIONS!

### JURISDICTION

THIS IS A CIVIL ACTION THAT FALLS UNDER THE COURTS ORIGINAL JURISDICTION UNDER 28 U.S.C. 1331 (FEDERAL QUESTION) THE CASE ALLEGES VIOLATIONS OF SERVICE MEMBERS CIVIL RELIEF ACT VIOLATION OF DECEPTIVE PRACTICES, VIOLATIONS OF FAIR DEBT COLLECTIONS ACT, INTENTIONAL EMOTIONAL DISTRESS, INTENTIONAL FINANCIAL DISTRESS, LIBEL SLANDER, BELITTLEMENT, DEGRADATION, THERE ARE VIOLATIONS OF THE INSURANCE LAWS, THERE IS RACKETEER INFLUNCED AND CORUPT ORGANIZATION ACT, THERE ARE VIOLATIONS IN THE TRUTH AND LENDING ACT, THERE IS DEFAMEATION, A MURDER CONTRACT, BREECH OF IMPLIED COVENANT OF GOOD FAITH AND FAIR DEALING, THERE IS EXTREME PERSON INJURY RESULTING FROM THE MURDER CONTRACT, AND THE UNJUST INRICHMENT FROM THE BOUNTY ON PLAINTIFFS AND THERE FAMILIES AND FRIENDS. A MOTION FOR A RESTRAINING ORDER WILL BE THE FIRST MOTION FILED BY THE PLAINTIFFS.

### FACTUAL ALEGATIONS

THE PLAINTIFFS ARE ENTITLED TO RELIEF BECAUSE OF THE DEFENDANTS CONSPIRACY TO DESTROY THE FAMILY, ESPECIALLY PLAINTIFF TERRY KERR. BANK OF AMERICA CEO WANTS TERRY KERR DESTROYED AND TAKE NO PRISONERS KIND OF WAR. COME ON FOLKS CEO BRIAN MONYHAN RECENTLY HAD A ST@CKHOLDER MEETING TO REPLACE HIM. AFTER ALL THERE WAS THE 20 BILLION DOLLAR FINE IN THE HOUSING CRIME FOR DEFECTIVE PRACTICES, MORE PEOPLE COMMITTED SUICIDE OVER BANK OF AMERICA STEELING THIER HOMES THAN SOLDIERS THAT DIED IN THE IRAQ WAR. THEN BANK OF AMERICA PAID A 380 MILLION FINE FOR THE SERVICE MEMBERS RELIEF ACT VIOLATIONS, THEN BANK OF AMERICA PAID 490 MILLION FOR THE QBE INSURANCE SCAM, THEN BANK OF AMERICA PAID

800 MILLION FOR THE WRONGFULL FEES VIOLATIONS, ETC. ETC. ETC. THE STOCKHOLDERS DID NOT REPLACE HIM THOUGH CAUSE OF ALL THE PROFITS MADE FROM THE ILLEGAL VENTURES. GREED OVERCAME ETHICS AND ONE WONDERS WHY THE COMPTROLLER OF CURRENCY AND THE BOARD OF GOVERNORS OF THE FEDERAL RESERVE DID NOT TAKE AWAY THIER LIENCE TO DO BANKING? BANK OF AMERICA JUST BUYS OFF EVERYONE! THE CONTRACT PUT ON TERRY KERR'S HEAD IS SIMILIAR TO HERROD HAVING JOHN THE BAPTIST KILLED AND HIS HEAD PUT ON A PLATE AT THE BANQUET HALL PARTY. TERRY KERR'S BLOODY SHEETS AND BLOODY BLANKETS WERE SOLD AT THE PARTY HELD FOR HIS DEATH, BUT HE DID SURVIVE WITH GRIEVIOUS INJURIES. THE ROMAN EMPIRE FELL SOON AFTER AND SO WILL THE UNITED STATES WHEN THERE IS NO CRIMES THAT THE PEOPLE WITH THE GOLD CAN BE HELD FOR. THE NEW GOLDEN RULE, THOSE WHO HAVE THE GOLD RULE. AS MARTIN LUTHER KING SAID JUST BEFORE THEY MURDERED HIM, ( WHEN THERE IS INJUSTICE ANYWHERE THERE WILL BE INJUSTICE EVERYWHERE), AND THAT IS THE CURRENT STATE OF DEMOCRACY IN THE UNITED STATES. NO ONE IS HELD ACCOUNTABLE FOR THEIR ACTIONS, YOUNG BLACK CHILDREN HOLDING A BAG OF SKETTELS ARE KILLED AND NOTHING CAN BE DONE ABOUT IT. IT HAPPENS ALMOST EVERYDAY NOW, AND CEO'S CAN HAVE A PERSON KILLED FOR SPORT, AND THERE IS NO JUSTICE CAUSE EVERYONE CAN BE BOUGHT OFF. THE PERSON WHO TELLS THE TRUTH MUST DIE LIKE JOHN THE BAPTIST TYPES CAUSE THE SHEEP PEOPLE CANNOT KNOW THE TRUTH AND THE FACTS! AMAN.

#### FACTUAL ALLEGATIONS

WHAT HAPPENED TO THE PLAINTIFFS WAS A COMPLETE AFFRONT TO THE JUSTICE SYSTEM! THIS COULD ONLY HAPPEN IN A(CULTURE OF CORPTION SOCIETY). THE PLAINTIFF DENNIS KERR BOUGHT THE HOUSE

WITH A MORTGAGE FROM COUNTRYWIDE MORTGAGE COMPANY. EVERY THING WAS FINE TILL BANK OF AMERICA TOOK OVER. BANK OF AMERICA WAS TO DO NEW MODIFICATION LOANS WITH THE COUNTRYWIDE HOME OWNERS. BANK OF AMERICA HOWEVER JUST STOLE THE HOUSES USING DECEPTIVE PRACTICES AND CORPTION. THE MODIFICATION LOAN FOR DENNIS KERR WAS TO BE LOWER THAN THE CURRECT PAYMENT, BUT JUST LIKE MANY THOUSAND MORE THE BANK OF AMERICA DID FRAUD AND MADE THE PAYM,ENTS SO OUTRAGEOUS HIGH THAT THE HOME OWNERS LOST THERE HOMES. DENNIS KERR PAYMENTS WENT FROM 1434 DOLLARS PER MONTH TO 2950 DOLLARS PER MONTH, MORE THAN HE MADE. THEN THE BANK OF AMERICA SAID THAT HE SIGNED THE PAPERS FOR THE INCREASE IN THE BATTLEFIELDS IN IRAQ BUT THERE ARE NO PROCESS SERVERS IN IRAQ, AND THIER WAS THE SERVICE MEMBERS CIVIL RELIEF ACT, ANF THE ECONOMIC RECOVERY ACT OF 2008 THAT PUT TEETH INTO THE CIVIL RELIEF ACT CAISE OF ALL THE WRONGDOING BY THE MORTGAGE COMPANIES, THE 380 MILLION DOLLAR FINE PAID FOR BY BANK OF AMERICA FOR THE VIOLATIONS IN THE CIVIL SERVICE MEMBERS ACT. DENNIS KERR DID SIGN OVER POWER OF ATTORNEY TO HIS FATHER TERRY KERR, AND TERRY KERR STILL DOES HAVE POWER OF ATTORNEY IN THE ASWAN HOUSE ADVENTURE. SO WHEN THE BANK OF AMERICA DID THE SALE OF THE HOUSE TERRY KERR DID FILE SUIT AND IT HAS WENT ON FOR YEARS. WHAT DID HAPPEN WAS THAT TERRY KERR DID PUT IN TO ONE OF THE BRIEFS THAT IF THERE WAS ANY JUSTICE THAT HE WOULD WIN THE 30 MILLION DOLLAR SUIT AND HE WOULD GET THE HEADQUARTERS IN CHARLSTON, SOUTH CAROLINA AND HE WOULD BULLDOSE THE BUILDINGS TO THE GROUND AND PUT A FORCLOSED SIGN FLAG ON TOP OF THE BULLDOZED BUILDING HEADQUARTERS. WELL, THIS DID PISS OFF THE EGO CRAZED, POWER CRAZED CEO BRIAN MONYHAN AND HE SET OUT TO QUASH THE LITTLE CREATURE WHO THOUGH THAT THERE IS STILL A

CHANCE THAT ALL JUSTICE WAS NOT LOST IN THE UNITED STATES OF AMERICA. HOWEVER THE COMPTROLLER FOR THE NATIONAL BANKS N.A., AND THE FEDERAL RESERVE BOARD OF GOVERNORS AGREED WITH HIM AND HE GOT A CASH PAYMENT FROM THE BANK OF AMERICA AFTER THE INDEPENDANT FORCLOSEURE REVIEW PEOPLE RULED IN DENNIS KERR'S FAVOR AND ALSO INFAVOR OF A COUPLE OF TERRY KERRS FRIENDS WHO HAD THE SAME PROBLEMS. THEN TERRY KERR WON THE LAWSUIT AGAINST BANK OF AMERICA FOR WRONGFULL FEES, AND THE CASE AGAINST THE BANK OF AMERICA FOR TRYING TO STEAL THE HOUSE OF DENNIS KERR WAS STILL GOING ON. PLAINTIFF TERRY KERR HAD A SMALL BLOOD CLOT IN HIS LOWER LEG AND THE BANK OF AMERICA LAWYER AMBER DINA FOUND OUT CAUSE HE HAD TO RESET A HEARING THAT BANK OF AMERICA LAWYER AMBER DINA WAS TO ATTEND. BANK OF AMERICA ATTORNEY AMBER DINA THEN GOT AHOLD OF RISK MAGAGEMENT DIRECTOR AT THE HOSPITAL AND SET UP THE KILL ON TERRY KERR, BUT ONCE AGAIN TERRY KERR DID SURVIVE. WHEN TERRY KERR DOES HIS AFFIDAVIT TO THE COURT HE WILL LIST THE 55 TIMES HE DIED , SHOULD OF DIED, OR COULD HAVE DIED, TO SHOW THAT THE SMEAR CAMPAIGN AGAINST HIM IS JUST LIES, CAUSE A PERSON COULD NOT DIE THAT AMNY TIMES AND COME BACK WITH OUT SOME KIND OF DIVINE HELP. TRUELY A GARDIAN ANGLE STORY. PROVES THE DEFAMEATION FACTS THOUGH. SO THEN THE BANK OF AMERICA STEALS THE INSURANCE CHECK AND NEVER PAYS THE CONTRACTOR, THAN THE BANK OF AMERICA PAYS AVCO FINANCE TO STEAL THE HOUSE THROUGH A WRONG FULL TRUSTEE SALE, BUT THE NOTICE OF PENDANCY OF ACTION LIST PENDANS FILING DID SAVE THE HOUSE AGAIN., AND AVCO DOES A VALID RECONVEYANCE DEED. SO NOW BANK OF AMERICA DOES ANOTHER TRUSTEE SALE AND GIVIES THE HOUSE OVER TO SENACA SERVICING TO DO THE DIRTY WORK. SENACA MORTGAGE SERVICING HAS THE WORST RECORD IN THE MORTGAGE SERVICING .

OF COURSE THIS IS JUST WHAT THE RACKETEER INFLUNENCED AND CORPT ORGANIZATION BANK OF AMERICA WANTS. SENACA WILL DO ANYTHING FOR THE ALL MIGHTY DOLLAR AND THE PAYOFF IS ON AGAIN. MEANWHILE AT THE SAME TIME TERRY KERR HOUSES IN IDAHO ARE SUDDENLY BOTH HAVING TRUSTEE SALES. ONE IS A JUDICIAL FORCLOUSURE SALE TO BE DONE BY THE SHERIFFS OFFICE AFTER A BOUGHT OFF JUDGE ORDERS A VALID RECONVEYANCE DEED THAT HAS BEEN LEGAL FOR 9 YEARS TO BE INVALID. THEN ORDERS THE CLERKS OFFICE TO CHANGE THE DATE ON THE LAWYERS CASE SO THAT A DEFAULT JUDGEMENT IS INVALIDATED, AND AT THE SAME TIME THE LAWYER FOR THE HOSPITAL DOES A DEFAULT JUDGE MENT AGAINST THE CASE TERRY KERR HAS AGAINST THE HOSPITAL. THE JUDGE SAYS THERE IS NO SUCH THING THAT HE IS ASKING FOR AND ISSUE AN ORDER ABOUT IT AND WHAT TO HAPPEN NEXT. BUT THE CLERK OF THE COURT DOES NOT SEND THE ORDER TO TERRY KERR AND A LONG TIME LATER WHEN TERRY KERR ASKS WHAT IS THE STATUS THEY TELL HIM AND HE SAYS I NEVER RECIEVED THE ORDER, THEN THE CLERK OF THE COURT SENDS THE ORDER TO HIM BUT DOES NOT PUT THE RIGHT AMOUNT OF STAMP ON IT AND IT GETS TO HIM AFTER THE TIME TO DO WHAT THE ORDER SAYS. MEANWHILE THE ORDER FROM THE COURT IN THE HOUSE CASE GETS SENT BUT IT ALSO NEVER GETS TO HIM AND THAT CASE IS CLOSED AND THE TIME TO APPEAL IS OVER. THEN HE DOES AN PLAINTIFFS REPLY BRIEF AND IT IS SENT OVERNIGHT WITH TRACKING NUMBER AND IT IS LOST, IT IS FOUND 14 DAYS AFTER IT WAS TO BE FILED AND WAS NOT ALLOWED. SO MUCH FOR JUSTICE. THEN THE LAWYER FOR THE HOSPITAL FINDS OUT ABOUT THE TRUSTEE SALE TO BE HAD ON THE OTHER HOME OWNED BY TERRY KERR AND HAS HIS PARTNERS KID IN SEATTLE DO THE FORCLOSURE AND GET IN ON THE BANK OF AMERICA GRAVY TRAIN FOR DESTROYING PLAINTIFF TERRY KERR. THEN THERE ARE THE HARRASMENT CALLS FROM

FROM BOUGUS CR£DITORS AND VIAGRA SALESMEN FROM INDIA AND HIS WIFE GETS STOPPED EVERY TIME SHE GOES INTO A STORE AND HIS HIGH SCHOOL KID GETS AN F IN BAND FROM A TEACHER WHO CALLS HIM STUPID IN BAND CLASS THEN ALL THE OTHER GANG UP ON HIM. THEN THE WIFE WHO IS 60 YEARS OLD GETS SECURITY AT A CASINO TO SAY SHE IS ACTING LIKE A PROSTITUTE AND FORBIDS HER TO HAVE A DRINK ETC. TERRY KERR'S WIFE AND KID ALSO HAVE THE BOUTY ON THIER HEAD, BUT THEY CAN MAKE MORE MONEY FROM BANK OF AMERICA IF THEY CAN GET THE KERR'S TO COMMIT SUIVIDE. ISIS SHOULD TAKE LESSONS FROM BANK OF AMERICA ON WAYS TO KILL PEOPLE AND GET AWAY WITH IT. BANK OF AMERICA DOES NOT HAVE TO WORRY THOUGH CAUSE THEY HAVE EVERYONE IN THIER POCKET. THOSE WHO HAVE THE GOLD RULE!

THE PLAINTIFFS CAN PROVE THE CLAIMS DESCRIBED AND ARE ENTITLED TO RELIEF. THE ACTIONS AND PRACTICES DESCRIBED ARE SO UNCONSCIONABLE AND DONE IN SUCH BAD FAITH MISCONDUCT WITH THE OBJECTIVE TO DO UNLAWFULL ACTIONS AND GET LAWFULL RESULTS, THE STEALING OF THE PLAINTIFFS HOMES AND THE PURPOSEFULL INJURING AND HARMING OF THE PALINTIFFS FRO SPORT AND FOR PROFIT. THE PLAIN TIFFS BELIEVE THAT THE EGREIOUS AND UNSCRUPULOUS CIVIL AND CRIMINAL RACKETEERING COUPLED WITH THE RACIAL ANIMUS IS A COMPLETE AFFRONT TO THE JUSTICE SYSTEM AND DEMOCRACY AS WE KNOW IT, AND THIS WILL RESULT IN THE END OF DEMOCRACY IN AMERICA!

#### STATEMENT OF THE ISSUES

THE BANK OF AMERICA, THE ZION BANK, NATIONSTAR MORTGAGE, THE TRUSTEE CORPS, SENACA SERVICING, ROBINSON TAIT, AKERMAN, QUINNEY NEBEKER, POOR ROTH AND ROBINSON AND RCO LEGAL THE DEFENDANTS DID CIVIL AND CRIMINAL CONSPIRACY AND DID NEGIGENTLY, WILLFULLY, CONTRACTUALLY, MALICIOUSLY, AND OTHERWISE ARE LEGALLY RESPOSIBLE



FOR THE EVENTS AND HAPPENINGS THAT RESULTED IN THE WRONGFULL  
FORCLOSURES OF THE PLAINTIFFS HOMES, THE INTENTIONAL INFLICKTION  
OF EMOTIONAL DISTRESS, THE INTENTIONAL INFLICTION OF FINANCIAL  
DISTRESS, THE INTENTIONAL INFLICTION OF PHISICAL INJURIES, THE  
BAD FAITH MISCONDUCT, THE EXCESSISE CALLOUSNESS, THE CRIMINAL AND  
CIVIL RACKETEERING THAT RESULTED IN SUCH EVIL TO BE PLACED UPON  
THE KERR FAMILY THAT SUICIDE IS THE ONLY WAY OUT OF THE INTENTION  
AL PROBLEMS CAUSED TO CAUSE SUCH GRIEF THAT A PLAINTIFF WHO HAD  
4 HEART ATTACKS AND SURGERIES TO REPAIR THE ISSUES BE DEALT A  
HAND OF EVIL TO CAUSE SO MANY PROBLEMS THAT THE ISSUES OVERCOME  
HIS HEALTH AND KILLS HIM IS JUST INCOMPATIBLE WITH THEEVOLVING  
STANDARDS OF DECENCY THAT MARK A JUST AND FAIR SOCIETY. THE  
UNITED STATESOF AMERICA IS NO MORE, THE CONSTITUTION IS NO MORE,  
JUSTICE IS NO MORE, FREEDOM IS JUST A DREAM, LIKE MARTIN LUTHER  
KING SAID, ( INJUSTICE ANYWHERE LEADS TO INJUSTICE EVERYWHERE ).  
THE CIRCUMSTANCES AND FACTS OF THE MANY VIOLATIONS OF THE OVERT  
ACTS WILL BE GIVEN IN COMMON DESIGN TO PROVE THE SPECIFIC PURPOSE  
THE ACTUAL MALICE AND CRIMES WILL BE DOCUMENTED WITH FACTUAL  
MATERIALITY AND PROVE THE CRIMES AND PERMIT THE RECOVERY OF THE  
DAMAGES, ACTUAL AND PUNITIVE.

#### CONCLUSION

THE PLAINTIFFS WILL PRESENT EVIDENSE AND EXHIBITS OF PROOF TO  
SUPPORT HIS CLAIMS AGAINST THE DEFENDANTS WITH PARTICULARITY.  
THE DEFENDANTS HAVE SHOWN A DELIBERATE INDEFFERANCE TO THE HARM  
FULL CONSEQUENCES OF THEIR CIVIL AND CRIMINAL RACKETEERING,  
AND THEIR ILLEGAL AND REPREHENSIBLE BAD FAITH MISCONDUCT!

1. BANK OF AMERICA, ZIONS BANK AND NATIONSTAR DID CONSPIRE TO  
STEAL THE HOMES OF THE PLAINTIFFS. THEY PAID THE TRUSTEE CORPS,

SENACA SERVICING, AND ROBINSON TAIT TO WRONGLY, ILLEGALLY, AND USE DECEPTIVE PRACTICES TO STEAL THE HOMES IN CONSPIRACY DOING VIOLATIONS OF THE RICO ACT. AKERMAN NEVADA HANDLES THE NEVADA HOUSE AND AKERMAN UTAH USES HANDLES THE IDAHO HOUSE, AND THEY DID COMUNICATE WITH QUINNEY AND NEBEKER TO DO THE OTHER IDAHO HOUSEAND THEY DID COMUICATE WITH POOR ROTH AND ROBINSON TO DO VIOLATIONS OF THE RICO ACT, AND THEY ALL COMUNICATED WITH RCO WHO HAD THE CEO OF BANK OF AMERICA COME DOWN TO IDAHO FALLS TO WITNESS THE EVICTION AND ILLEGAL SALE OF THE PLAINTIFFS HOUSE. ALL THE EMAILS THE TEXTS, THE FAXS, AND PHONE CALLS DO PROVE THE CONSPIRED VIOLATIONS OF THE RACKETEER INFLUENCED AND CORPT ORGANIZATION ACT CRIMES. THEY ALL CONSPIRED TO MAKE A UNLAWFULL ACTIONS INTO LAWFULL RESULTS, LIKE PAYING THE JUDGE TO OVERRIDE A LAWFULL 9 YEAR OLD RECONVEVANCE DEED ETC. THE PLAINTIFFS CAN PROVE EVERYTHING, BUT DO TO THE CULTURE OF CORUPTION NOTHING HAS BEEN DONE ABOUT ANYTHING YET. BUT THE PLAINTIFFS HAVE HAD FAIR JUDGES IN THE PAST AND STILL BELIEVE THAT THERE ARE FAIR JUDGES THAT ARE ABOVE TAKING PAYOFFS FOR INJUSTICE!

FIRST COUNT FOR RELIEF

1. THE VIOLATIONS OF THE ANTI-TYING PROVISIONS OF THE BANK HOLD-ING ACT, 12 U.S.C. 1972 ET SEG. THE BANKS BANK OF AMERICA AND ZIONS BANK PUT THE PLAINTIFFS MORTGAGE INTO A HOLDING COMPANYS AND HAD THEM CHANGE THE MORTGAGE CONTRACTS. THIS SCHEME VIOLATES THE ANTI-TYING PROVISIONS OF THE BANK HOLDING COMPANY ACT, 12 usc 1972 ET SEG, 12 USC 1972(B) STATES THAT THE HOLDING COMPANIES CANNOT VARY THE SERVICE, THE CONDITIIONS, AND THE REQUIREMENTS FROM THE ORIGINAL MORTGAGE. THIS RESULTED IN FORCED PLACED INSURANCE, WRONGFULL FEES, EXCESSIVE COMMISIONS, AND HUGE ANOR

INCREASE IN THE MONTHLY PAYMENT THAT WAS UNWARRENTED. WHEREFORE THE PLAINTIFF IS ENTITLED TO 3 TIMES THE DAMAGES SUSTAINED, AND COSTS, PLUS AN INJUNCTION BARRING THE DEFENDANTS FROM CONTINUING THEIR UNLAWFULL CONDUCT.

SECOND COUNT FOR RELIEF

2. VIOLATIONS OF THE RACKETEER INFLUENCED AND CORUPT ORGANIZATION ACT, 18 USC 1962(C). AT ALL TIMES RELEVANT DEFENDANTS WERE EMPLOYED BY AND ASSOCIATED WITH AN ILLEGAL INTERPRISE AND CONDUCTED AND PARTICIPATED IN THAT ENTERPRISE THROUGH A PATTERN RACKETEERING ACTIVITY CONSISTING OF NUMEROUS AND REPEATED USES OF EMAILS AND OTHER COMUNICATIONS TO EXECUTE A SCHEME TO FEDRAUD, ALL IN VIOLATION OF THE RACKETEER INFLUENCED AND CORUPT ORGANIZATION ACT, 18 USC 1962(C). THE DEFENDANTS WERE PAID TO EXECUTE THE CRIMES AGAINST THE KERR FAMILY. ALSO THE SMEAR CAMPAIGN, AND THE VIOLATIONS OF THE DECEPTIVE AND UNFAIR PRACTICES ACT ALL TO DESTROY THE KERR FAMILY AND IN VIOLATION OF 18 USC 1341 AND 1343. THE COMMON PURPOSE OF DESTROYING THE KERR FAMILY WAS SO EGGREIOUS THAT ONCE PLAINTIFF DENNIS KERR LET PLAINTIFF TERRY KERR OFF AT A GAS STATION TO GO TO THE BATHROOM WHILE HE FILLED UP WITH GAS, THERE WERE TWO YOUNG WEMON AT THE DOOR ALL EXCITED AT SEEING THE CAR WITH BAG LADY LISENCE PLATES THAT THEY COULD NOT HELP THEM SELVES AND TALKED LOUDLY WITH TERRY KERR STANDING BEHIND THEM, THERE IS A NUMBER YOU CAN CALL IF YOU SEE THE CAR AND THE KERRS AND TELL THE PEOPLE ON THE LINE WHERE THE KERRS ARE CAUSE THEY ARE BEING TRACKED SO THAT SCAMS CAN BE SET UP TO HARM THEM. THE TWO WOMEN CALLED THE NUMBER AND WERE GIVEN A REWARD BY THE DEFENDNATS LAWYERS FOR THE INFORMATION. TERRY CALLED THE NUMBER AND STARTED GIVING THEM FALSE REPORTS TO GET THE REWARD MONEY!

EVERY TIME PLAINTIFF TERRY KERR GOES INTO A EATING PLACE HE SEES THE PERSON AT THE COUNTER WAITING ON HIM MAKE A CALL ON THE HAND HELD PHONE. EVER SINCE HE FILED A COMPLAINT WITH THE WASHOE COUNTY HEALTH DEPARTMENT CAUSE THE PIZZA HUT IN SPANISH SPRINGS SERVED HIM BLOODY CHICKEN WINGS, AND THE WASHOE HEALTH DEPARTMENT CITED THE PIZZA HUT FOR WRONGFULL ISSUES AND MADE THEM DO CHECKS ON EVERY PIECE OF CHICKEN COOKED FOR RIGHTFULL TEMPS THE PIZZA HUT TRYS TO GET VENGEANCE AGAINST HIM. THEY PURPOSELY MAKE A UNEATABLE PIZZA AND PLAINTIFF TERRY KERR TAKES IT BACK AND WANTS A REFUND FOR THE UNEATABLE PIZZA, THE PIZZA HUT CALLS THE SHERIFF AND FILES A COMPLAINT AGAINST HIM. THE SHERIFF DOES NOT ASK FOR THE PLAINTIFFS SIDE OF THE STORY AND NEVER WILL, CAUSE OF THE REWARD MONEY FOR HIS DEATH AND DESTRUCTION OFFERED BY BANK OF AMERICA LAWYERS. IN BILLINGS MONTANA THE LAWYER FOR BANK OF AMERICA PAID THE HOSPITAL TO KILL HIM. HE SURVIVED AND DID FILE SUIT. THE BANK OF AMERICA SETTLED WITH HIM. HE ALSO WON A LAWSUIT AGAINST BANK OF AMERICA FOR WRONGFULL FEES ETC, BUT WHEN BANK OF AMERICA CEO BRIAN MOYIHAN FOUND OUT HE ORDERED THE DESTRUCTION OF TERRY KERR, BRIAN MOYIHAN PERSONALLY FLEW HIS JET TO IDAHO FALLS, IDAHO AND WENT TO THE SHERIFFS OFFICE TO COMPLAIN THAT THEY WERE NOT EVICTING TERRY KERR FAST ENOUGH AND DOING THE JUDICIALLY ORDERED SALE OF HIS HOUSE FAST ENOUGH. ALSO THERE WERE SUITS WITH HIM. SO NOW EVERY WHERE HE GOES AND HIS WIFE AND CHILDREN ARE SUBJECTED TO EVIL ACTS. HIS WIFE WAS STOPPED IN WALL MART AND SEARCHED EVERY TIME SHE WENT THERE. A MAN BEHIND HER WITH 4 LITTLE CHILDREN AT WALL MART CHECK OUT COUNTER SAID ( SEE, SEE WHAT HAPPENS IF YOU DON'T TAKE BATHS), AND WALMART EMPLOYEES CALLED HER A VODOO PRIESTIST. THIS LAST

SHE SAID THAT SHE WISHED SHE WERE NOT BLACK. YOU SEE THERE IS ALSO A REWARD FOR THE DEATH OF TERRY KERR'S WIFE AND CHILDREN BY BANK OF AMERICA. TERRY KERR'S SON IS CALLED STUPID AT THE HIGH SCHOOL HE GOES TO BY THE BAND TEACHER AND IS THE ONLY ONE THAT GETS A F IN CLASS. TERRY KERR'S WIFE WHO IS 60 YEARS OLD GETS CHECKED AT A CASINO FOR BEING A HOOKER, AND IS TOLD THAT PROSTITUTES CANNOT BE IN THE CASINO AND ALSO IS NOT ALLOWED TO HAVE A DRINK. THE BANK OF AMERICA LAWYERS GET MORE PAY IF THEY CAUSE A DEATH TO THE PLAINTIFFS FAMILY, AND DEATH BY SUICIDE~~DEATH~~ IS THE PREFERRED ACT OF THE EVIL VILLIANS.

THE DEFENDANTS AT ALL TIMES RELEVANT WERE EMPLOYED BY OR ASSOCIATED WITH THE ILLEGAL INTERPRISE AND CONDUCTED AND DID PARTICIPATE THROUGH A PATTERN OF RACKETEERING ACTIVITY CONSISTING OF NUMEROUS AND REPEATED COMUNICATIONS TO EXECUTE A SCHEME TO HARM THE PLAINTIFFS AND FAMILY MEMBERS AND USED WIRE COMUNICATION TO DO SO. ALL IN VIOLATION OF RICO 18 USC 1962 (C). THE COMMON PURPOSE WAS TO CAUSE THE PLAINTIFF TERRY KERR SOMUCH GRIEF AND MISERY AND PAIN THAT THE STRESS FROM IT ALL WOULD GIVE HIM A 5th HEART ATTACK. KING HERROD(DBA BRIAN MOYIHAN) WANTS TERRY KERR'S HEAD ON A PLATE AT HIS BANQUET PARTY. THE KERR FAMILY HAS SUFFERED AT THE HANDS OF THE UNSCRUPULOUS AND EGRIECIOUS VILLIANS AND THE EMAILS FROM THE DIFFERNENT LAW FIRMS, AND THE PHONE CALLS, AND THE TEXTS FROM THE DEFENDANT LAW FIRMS WILL PROVE THE CALLOUS SMEAR CAMPAIGN AND THE ACTUAL MALICE INVOLVED AND THE PAYMENTS FROM THE LAWYERS TO THE VILLIANS INVOLVED! wherefore the plaintiffs demand judgement against the defendants FOR COMPENSATORY DAMAGES, INJUNCTIVE AND DECLARATORY RELIEF, COSTS, AND ANY OTHER RELIEF AS THE COURT DEEMS JUST AND PROPER.

THIRD COUNT FOR RELIEF

3 THE THIRD COUNT FOR RELIEF IS THE VIOLATIONS OF THE SERVICE MEMBERS CIVIL RELIEF ACT, (50 USC APP. 501-596) SCRA, AND ALSO SECTION 2203 OF THE HOUSING ECONOMIC RECOVERY ACT OF 2008 (HERA) PUB L. 110-289, 122 STAT. 2654 (2008) AND UPDATED SECTIONS OF THE SCRA TO PROVIDE ADDITIONAL RELIEF TO SERVICE MEMBERS. THE NEW MODIFICATION LOAN THAT WAS TO LOWER THE PAYMENT ABOUT 300 DOLLARS PER MONTH, WAS ALTERED BY BANK OF AMERICA TO THE NEW PAYMENT OF 2950 DOLLARS, AN INCREASE OF MORE THAN 1500 DOLLARS PER MONTH AND THEN THE BANK OF AMERICA SAID THAT DENNIS KERR SIGNED THE AGREEMENT IN IRAQ. HE WAS DEPLOYED TO THE IRAQ WAR DOING A TOUR OF DUTY. THE BANK OF AMERICA SAID THAT THE PAPERS TO THE NEW MODIFICATION AGREEMENT WERE SIGNED BY DENNIS KERR IN IRAQ AND HE AGREED TO THE NEW 2950 DOLLAR MONTHLY PAYMENT, THAT WAS MORE THAN HE MADE. PLUS HOW COULD HE HAVE SIGNED A PAPER IN IRAQ, THIS WAS NOT POSSIBLE THERE WAS NOT ANY INTERSTATE OR FOREIGN WIRE OR MAIL ALLOWED IN THE WAR ZONE. THIS WAS FRAUD AND TORTIOUS INTERFERENCE WITH A BUSINESS RELATIONSHIP. THIS WAS ANOTHER EXAMPLE OF THE PLAINTIFFS CLAIMS UNDER THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT 18 USC 1962(D) AND 18 USC 1964. COUPLED WITH THE VIOLATIONS OF THE SERVICE MEMBERS CIVIL RELIEF ACT AND THE HOUSING ECONOMIC RECOVERY ACT OF 2008. THE PLAINTIFFS CAN PROVE THE ACTUAL VIOLATIONS AND THEREFORE CAN GET RELIEF FOR ACTUAL DAMAGES, COMPENSATORY DAMAGES, PUNITIVE DAMAGES, AND DAMAGES FOR RICO VIOLATIONS.

FOURTH CLAIM FOR RELIEF

4. THE PLAINTIFFS SUFFERED INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS AND RECKLESS NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS.

THE PLAINTIFF CAN ESTABLISH THAT THE DISTRESS WAS EXTREME AND OUTREAGEOUS CONDUCT WITH THE INTENTION OF RECKLESS DISREGARD FOR CAUSING EMOTIONAL DISTRESS, AND THE PLAINTIFF HAVING SUFFERED SEVERE AND EXTREME DISTRESS AND CAN PROVE THE ACTUAL CAUSATION AS IN ( STAR V. RABELLO, 97 NEV. 124, 125, 625 P2d 90, 91,92 (1981)). THE 3 HOUSING TRUSTEE SALES WERE DONE INTENTIONALLY AT THE SAME TIME AND CONSPIRED BY THE BANKS WITH THERE LAWYERS TO CAUSE HARM TO THE PLAINTIFFS AND HOPEFULLY MAKE THE PLAINTIFF HAVE A 5th HEART ATTACK AND THUS GET THE REWARD OFFERED BY BANK OF AMERICA CEO FOR THE DEATH AND DESTRUCTION OF PLAINTIFF TERRY KERR AND HIS FAMILY. THIS CONSTITUTED CIVIL CONSPIRACY WITH THE DEFENDANTS LAWYERS AND THE BANKS AND THE SERVICE COMPANIES TO DO THE CONSPIRED ILLEGAL TRUSTEE SALES IN UNISON. AT THE BOTTOM OF THE TRUSTEE SALE DATE IS SAYS ( QUOTE) IF THE TRUSTEE IS UNABLE TO CONVEY THE TITLE FOR ANY REASON, THE SUCCESSFUL BIDDERS SOLE AND EXCLUSIVE REMEDY SHALL BE THE RETURN OF MONIES PAID TO THE TRUSTEE AND THERE IS NO OTHER RECOURSE. THIS IS BECAUSE THEY DID THE ILLEGAL FORCLOSURE TRUSTEE SALE BEFORE AND WERE SUED BY THE SUCCESSfull bidder when they could not provide deed to the property CAUSE THERE WERE LIS PENDANS COURT LIENS ON FILE AT THE CLERK OF THE COURT OFFICE. THE UNLAWFULL SALE THAT WAS DONE BY ADVERTIZING IN THE PAPER SO THE PLAINTIFFS WOULD NOT KNOW ABOUT THE SALE AND THE UNLAWFULL FORECLOSURE PROCEEDINGS DONE WITH FRAUDULENT AND MISREPRESENTATION CONCEALMEANT, WAS A BREECH OF THE MODIFICATION AGREEMENT BY COUNTYWIDE HOMES, THEN ACQUIRED BY BANK OF AMERICA BY CIVIL CONSPIRACY WITH THE TRUSTEE COMPANIES. THE BANK OF AMERICA TOLD OTHER BANKS AND OTHER TRUSTEE COMPANIES TO DO ACTUAL MALICE TO THE PLAINTIFFS AND TO DO ILLEGAL TRUSTEE SALES TO CAUSE THE PLAINTIFFS HARM. THESE INFERENCES FROM THE PROVEN FACTS DO

SHOW THE CONSPIRACY TO MAKE THE PLAINTIFF SUFFER FROM ALL THE ILLEGAL AND FRAUDULENT ACTIONS CAN BE PROVEN AND IT IS AXIOMATIC THAT TRUTH IS A COMPLETE DEFENSE TO A CIVIL ACTION FOR LIBEL, AND DEFAMEATION OF CHARACTER, AND INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS. THE DEFENDANTS MADE FALSE AND DEFAMITORY STATEMENTS ABOUT THE PLAINTIFFS AND DID CONSPIRE THESE FALSE STATEMENTS AND DID CONSPIRE FRAUDULENT ACTIONS, AND ALL CAN BE PROVEN. ALSO THE TELLING OF THE BANK OF AMERICA TO THE OTHER DEFENDANTS TO DESTROY THE PLAINTIFFS BY ANY MEANS AND HAVINF THE CREDIT REPORTING COMPANIES DO FALSE STATEMENTS TO MAKE THIER REPUTATIONS INJURED AND TO SUFFER FROM ALL THE CREDIT CALLS FROM BOGUS MANUFACTURED LOANS AND EVEN THE 497 CALLS FROM A PHARMISUTICAL COMPANY FOR VIAGRA SHOWS THE CONSPIRED ACTIONS FOR THE PLAINTIFFS REPUTATION TO BE DAMAGED AND ALL THIS AMLICE AND SMEAR CAMPAIGN DID CAUSE THE STRESSFUL AND EMOTIONAL DISTRESS THAT CAN BE RELATED TO THE CAUSATION OF THE EMOTIONAL DISTRESS AND LIBEL SLANDERING MUST BE GRANTED A FAVORABLE INFERENCE. ONLY PRESIDENT OBAMA AND JESUS HAVE BEEN MORE SMEAR CAMPAIGNED. THE PLAINTIFFS CAN PROVE THAT DEFENDANTS DID COMMUNICATE INFORMATION TO OTHERS AND THAT THE COMMUNICATED INFORMATION WAS DEFAMATORY. SO THE PLAINTIFFS ARE ASKING FOR PUNITIVE DAMAGES, ACTUAL DAMAGES, COMPENSATORY DAMAGES FOR THIS OUTREAGEOUS CONDUCT DONE INTENTIONALLY AND OR RECKLESSLY TO HARM THE PLAINTIFFS.

#### FIFTH CLAIM FOR RELIEF

5 BREECH OF IMPLIED COVENANT OF GOOD FAITH AND FAIR DEALING. A COVENANT OF GOOD FAITH AND FAIR DEALING IS IMPLIED IN EVERY CONTRACT AND IMPOSES UPON EACH PARTY A DUTY OF GOOD FAITH AND FAIR DEALING IN ITS PERFORMANCE. COMMON LAWS CALLS FOR SUBSTAN-



TIAL COMPLIANCE WITH THE SPIRIT, NOT JUST THE LETTR, OF A CONTRACT IN ITS PERFORMANCE. WHERE THE AGREEMENT AFFORDS ONE PARTY THE POWER TO MAKE ILLEGAL MODIFICATIONS AND HAS THE ILLEGAL MODIFICATION SIGNED BY A FRAUDULENT SIGNER ALEDGEDLY DONE IN A WAR ZONE, IT LIKE SAYING A PERSON WHO DIED 3 YEARS AGO TODAY DID SIGN A NEW NOTE TO THE MORTGAGE COMPANY. THIS IS A COMPLETE AFFRONT TO THE JUSTICE AND LEGAL SYSTEM.

THEREFORE THE PLAINTIFFS ARE ALOWED COMPENSATORY DAMAGES AS WELL AS INJUNCTIVE RELIEF PREVENTING FUTHER VIOLATIONS AND THE PLAINTIFFS WILL FILE MOTION FOR INJUNCTIVE RELIEF AND FOR RESTRAINING ORDERS. THE PLAINTIFFS ARE ENTITLED TO PUNITIVE DAMAGES BECAUSE THE DEFENDANTS ACTED IN BAD FAITH AND MISCONDUCT TO BREECH THE FIDUCIARY OBLIGATIONS AND DID DELIBERATE ACTS OF BAD FAITH DONE IN RECKLESS AND INTENTIONAL DISREGUARD OF THE PLAINTS RIGHTS.

#### SIXTH CLAIM FOR RELIEF

6. TORTIOUS INTERFERENCE WITH A BUSINESS RELATIONSHIP. THE BANK OF AMERICA DID STEAL THE QBE INSURANCE CHECK AND DID NOT PAY FOR THE DAMAGES THAT QBE HAD ALOWED TO BE PAID AND THE HOUSE SAT VACANT FOR YEARS BECAUSE OF THE STEALING OF THE CHECK AND THE FAILURE TO PAY FOR THE DAMAGES ALOWED. THE PLAINTIFF TERRY KERR DID CALL THE BANK OF AMERICA 187 TIMES TO GET THE BANK OF AMERICA TO PAY THE CONTRACTOR TO GET THE REPAIRS DONE. THE STRESS FROM THIS CAUSED THE PLAINTIFF TO HAVE A HEART ATTACK, WHICH WAS THE PURPOSE OF THE STEALING OF THE CHECK AND THE INTENTION OF THE DEFENDANT BANK OF AMERICA. IT USED TO BE THAT CONSPIRACY TO MURDER WAS A CRIME BUT NOT ANYMORE. DO TO THE CULTURE OF CORPTION THE CONSPIRACY TO MURDER IS A TOOL IN THE CORPORATE BOX. MORE PEOPLE DIED FROM HEART ATTACKS AND SUICIDES FROM THE BANK OF

AMERICA STEALING THEIR HOME THREW DEFECTIVE PRACTICES AND FRAUD AND AS THE COMPTROLLER OF CURRENCY FOR NATIONAL BANKS N.A. SAID TO PLAINTIFF DENNIS KERR WHEN THEY MADE BANK OF AMERICA DO A FORCED PAYMENT TO HIM ( BECAUSE OF DEFISTIONCIES AND WRONGFULL PRACTICES IN THE FORCLOUSURE PROCESS BY BANK OF AMERICA YOU ARE AWARDED A CASH PAYMENT, THE CASE WAS DONE BY THE IDEPENDANT FORCLOSURE REVIEW BOARD, DONE WITH THE FEDERAL RESERVE BOARD.) CITING 15 USC 1602(C)PROHIBITS COMMUNICATIONS, 1602(D)prohibits HARRASSMENT AND ABUSE, 1602(E)PROHIBITS FALSE AND MISLEADING REPRESENTATIONS, 1602(F) PROHIBITS UNFAIR PTACTICES,AND !¢(@ (G) REQUIRING VAIDATION OF DEBTS WERE ALL ILLEGALLY DONE BY THE DEFENDANTS IN VIOLATION OF THE LAWS. THE DECISION TO STEAL THE INSURANCE CHECK WAS ALSO MOTIVATED BY RACIAL ANIMUS AND CONSTITUTES A HATE CRIME. THE BANK OF AMERICA LIED TO THE PLAINTIFFS FOR MONTHS AND TOLD OTHERS THAT THE PLAINTIFFS WERE MAKING UP THE STORY OF THEM STEALING THE INSURANCE CHECK AND PUT WRONFULL INFORMATION ABOUT THE ILLEGAL ACTION ON THE CREDIT REPORT ETC. THE WRONGFULL INFORMATION WAS TOLD TO THE PLAINTIFF FOR MONTHS THE EGREGIOUS AND DEFAMEATORY LIES WENT ON FOR MONTHS AND THIS COMUNICATION OF CONSPIRED LIES AND CIVIL RACKETEERING DID CAUSE THE PLAINTIFF TERRY KERR TO HAVE A HEART ATTACK, THE PLAN BY THE RACKETEERING BANK OF AMERICA TO CONTRAVENE THE REASONABLE EXPECTATION OF THE OTHER PARTY. THIS IS A CLEAR VIOLATION THAT CAN BE PROVEN AND ENTITLES THE PLAINTIFF TO ACTUAL DAMAGES, COMPENSATORY DAMAGES, PUNITVE DAMAGES, AND ANY OTHER DAMAGES THAT THE COURT MAY DEEM APPROPRIATE.

SEVENTH CLAIM FOR RELIEF

7. VIOLATIONS IN THE TRUTH AND LENDING ACT, TILA PROTECTS THE CONSUMERS FROM FRAUD, DECEPTION, AND ABUSE WITHIN THE RESIDENTIAL

SECURED LENDING MARKETPLACE BY MANDATING THAT LENDERS DISCLOSE CERTAIN INFORMATION TO BORROWERS. MCOMIE-GREY V. BANK OF AMERICA HOME LOANS, 667 F3d 1325, 1327 (9th CIR (2012)). THE THE TIME THE TILA CLAIM FOR DAMAGES IS ONE YEAR. ALL THE WRONGFULL AND ILLEGAL FORCLOSURES HAPPENED IN THE LAST 30 DAYS. 15 USC 1640 (E). THERE IS FRAUDULENT CONCEALMENT AND MISREPRESENTATION, IMPROPER ASSIGNMENT, BREACHES OF MODIFICATION AGREEMENTS, DECEIVING THE HOME OWNERS, CONSUMER FRAUD, AND THIS CALLOUS DISREGARD FOR WHAT THEY ARE TELLING THE HOME OWNERS CLEARLY ARE VIOLATIONS IN THE TRUTH AND LENDING ACT TILA. THE DEFENDANTS DID CONSPIRE THESE VIOLATIONS IN CONCERT AND THEREFORE THE PLAINTIFFS ARE ENTITLED TO ACTUAL DAMAGES, COMPENSATORY DAMAGES, PUNITIVE DAMAGES AND ANY OTHER DAMAGES THAT THE COURT MAY AWARD.

EIGHT CLAIM FOR RELIEF

8. VIOLATIONS OF THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATION ACT INCLUDE BUT NOT LIMITED TO, MISREPRESENTATIONS IN NOTICES AND OTHER DOCUMENTS, DECEPTIVE AND UNFAIR VIOLATIONS IN THE FORCLOSURE PROCESSES, VIOLATIONS OF THE DECEPTIVE AND UNFAIR PRACTICES LAWS, VIOLATIONS OF THE ANTI-TYING PROVISIONS, FAILING TO DISCLOSE THE KICKBACKS AND CASH FOR DEATH PAYMENTS ETC., THE DIRECT CONTRAVENTION OF ANTI-COERCION DISCLOSURES, THE PAYING OF KICKBACKS AND ILLEGAL PAYMENTS TO THE SERVICERS AND LAWYERS TO CAUSE INJURIES TO THE DEFENDANTS, (LIKE THE PAYMENTS TO THE VILLAIN TO DO THINGS LIKE, PUT PLAINTIFFS SOCIAL SECURITY FUNDS INTO SOME ONE ELSE'S ACCOUNT, REPEATEDLY, PAYING VILLAINS TO DO THINGS LIKE MAIL FRAUD AND MAIL THEFT, PAYING VILLAINS TO DO CRIMINAL CONSPIRACY TO MURDER. THE PLAINTIFFS MOTORCYCLE AFTER A 1000 MILE CHECK UP DID NOT HAVE ANY TRANSMISSIONS FLUID IN IT. SO IF THE PLAINTIFF

WOULD HAVE DRIVEN IT THE TRANSMITION WOULD HAVE LOCKED UP AND THE DRIVER WOULD HAVE WRECKED, THE DEFENDANTS PAID FOR ABUSE OF DISCRETION AND JUDICIAL MANIPULATION, THE DEFENDANT BANK OF AMERICA DID A SETTLEMENT WITH TERRY KERR FOR PAYING A DOCTOR AND A NURSE TO KILL HIM, THIS UNLIMITED POWER WITH NO SUPERVISION IS A RESULT OF THE CULTURE OF CORPTION, WHERE THOSE WHO HAVE THE GOLD RULE, LIKE BACK IN KING HERROD DAYS WHERE HE HAD JOHN THE BAPTIST KILLED AND HIS HEAD PUT ONTO A PLATTER AT THE BANQUET PARTY. NOW THE CEO OF BANK OF AMERICA IS PAYING VILLIANS TO MURDER THE PLAINTIFFS AND THERE FAMILY MEMBERS AND HAS BOUGHT OFF LAW ENFORCEMENT AND PROSECUTORS AND POLITIANS. THE KERRS JUSTICE BANK ACCOUNT IS BANKRUPT, AND THE CHECK FOR DAMAGES LABELED INSUFFICIENT FUNDS AND THE PLAINTIFF TERRY KERR HAS BEEN SO SMEAR CAMPAIGNED THAT PEOPLE ON THE STREET SAY TO HIM QUOTE ( HOWS HELL). WELL, MARTIN LUTHER KING JR, SAID QUOTE( INJUSTICE ANYWHERE IS A THREAT TO JUSTICE EVERYWHERE,) FOR IF A PERSON WHO STANDS UP FOR JUSTICE CANNOT GET JUSTICE THEN DEMOCRACY HAS FAILED AND WE THE PEOPLE IS NO MORE, IT IS WE WHO HAVE THE GOLD RULE, THE NEXT GOLDEN RULE!

NINTH CLAIM FOR RELIEF

9. THE NINTH CLAIM FOR RELIEF IS FOR DAMAGES CAUSED TO THE PLAINTIFF BY THE DEFENDANTS AND THE PEOPLE PAID TO DO THE PERSONAL INJURIES TO THE PLAINTIFF. THE INJURIES CAUSED BY THE DEFENDANTS AND PAYED TO THE VILLIANS TO DO THE INJURIES BOTH PHYSICAL AND EMOTIONAL ARE NOW EXCEEDING THE\$650,000,00 DOLLAR AMOUNT. IT USED TO BE AGAINST THE LAW TO PAY PEOPLE TO HURT OTHER PEOPLE, IT USED TO BE AGAINST THE LAW TO PAY PEOPLE TO CAUSE OTHER PEOPLE EMOTIONAL GRIEF AND STRESS, IT USED TO BE CALLED A HIT CONTRACT TO PAY SOMEONE TO MURDER ANOTHER PERSON THROUGH MALICE AND EGREGIOUS conduct, the plaintiffs little boy was injured 34 TIMES AT

a public school and never once was anything ever done about it. THE PLAINTIFFS SON WENT TO THE EMERGENCY WARD 27 TIMES WITH FOOD POISONING. THERE WAS NOT EVEN AN INVESTIGATION. AT LEAST WHEN THEY DID IT IN WASHOE COUNTY THE HEALTH DEPARTMENT DID DO AN INVESTIGATION, AND MADE THE VIOLATORS DO THE RIGHT THING. WELL WHEN ABNK OF AMERICA FOUND OUT ABOUT OUR MOVE TO THE RENO AREA THEY DID THE SAME THINGS AS THE OTHER PLACE, AND NOW THERE IS A COMPLAINT FILED WITH THE HUMAN RIGHTS PEOPLE AND THE SCHOOL IS HELPING SOLVE THE ISSUES THERE, BUT THE JUSTICE SYSTEM DID NOT EVEN SEND THE PAPERS TO THE PLAINTIFF TERRY KERR, THEN THE JUDGE SAYS OH IT WAS AN ERROR AND THE PAPERS WILL BE SENT TO YOU, THEN THE COURT PUT THE WRONG POSTAGE ON THE PAPERS BEING SENT TO DELAY AND THE PLAINTIFF DID NOT RECEIVE THE PAERWORK FROM THE COURT TILL AFTER THE DATE DUE HAD EXPIRED. THEN THE CASE WAS DISMISSED AND THE PLAINTIFF TERRY KERR WAS NOT SENT NOTICE OF THAT SO THERE COULD BE AN APPEAL. ETC ETC ETC ETC ETC ETC ETC. SO THERE IS NOT MUCH CHANCE FOR THE PLAINTIFFS TO RECEIVE JUSTICE IS A WORLD WHERE THE CULTURE OF CORUPTION LIVES, AND THOSE WHO HAVE THE GOLD RULE. THERE IS 62 PEOPLE WHO OWN HALF OF THE WORLD AND HAVE MADE THEMSELVES GODS AND RULE WITH UNLIMITED POWER AND FEAR NO KIND OF CONSEQUENCES FROM THE VIOLATIONS OF LAWS, RULES OR MORALS IT WILL BE TIME FOR JESUS TO COME. THE WORLD NEEDS FIXING, BUT TO STAND UP FOR THE TRUTH ONLY GETS YOUR LITTLE BOY INJURED 34 TIMES AT A PUBLIC SCHOOL AND NOTHING IS EVER DONE ABOUT IT. MY LITTLE BOY SAID HE WISHED HE WAS NEVER BORN, AND WHEN I ASKED HIM WHY HE SAID THAT HE REPLYED, THEN THEY COULD NOT HURT ME ANY MORE! THAT LETTER WAS SENT TO THE JUSTICE DEPARTMENT, SENATORS, CONGRESSMEN, GOVERNORS, THE SUPERINTENDANT OF SCHOOLS, ETCETCETC. AND NOBODY EVER DID ANYTHING ABOUT ANYTHING. BEING A BLACK CHILD

IN THE UNITED STATES OF AMERICA in 2016, IS THE SAME AS BEING A BLACK CHILD IN THE UNITED STATES OF AMERICA IN 1860! THERE IS NO MORE WE THE PEOPLE, BY THE PEOPLE, AND FOR THE PEOPLE. IT IS ABOUT WE THE CORPORATIONS FOR THE CORPORATIONS AND FOR THE RICH PEOPLE, THE NEW GOLDEN RULE IS WE WHO HAVE THE GOLD RULE. THE BANK OF AMERICA IS OWNED BY A SAUDIA ARABIAN KING AND HAS PLUNDERER THE UNITED STATES OF AMERICA FOR YEARS WITH DOMESTIC TERRORISM THERE IS THE 20 BILLION DOLLAR FINE FOR THE HOUSING SCAM, THERE IS THE 580 MILLION DOLLAR FINE FOR THE ILLEGAL FEES SCAM, THERE IS THE 380 MILLION DOLLAR FINE FOR THE SERVICE MEMBERS HOUSING SCAM, THERE IS THE 490 MILLION DOLLARS PAYOUT FOR THE INSURANCE SCAM, AND NOT ONE PERSON EVER WENT TO JAIL, BUT MORE PEOPLE DIED FROM ILLEGAL MORTGAGE FORECLOSURES FROM SUICIDE AND HEALTH RELATED PROBLEMS CAUSED BY THE SCAMS THAN THE SOLDIERS THAT DID DIE IN THE IRAQ AND AFGHANISTAN WARS. IT WAS THE SAUDIA ARABIA TERRORISTS WHO FLEW THE PLANES INTO THE NEW YORK BUILDINGS, NOT PEOPLE FROM IRAQ, YOU CAN'T OWN PROPERTY IN SAUDIA ARABIA, BUT THE SAUDIA ARABIA KING WHO OWNS BANK OF AMERICA CAN STEAL MANY THOUSANDS OF HOMES FROM THE UNITED STATES CITIZENS WITHOUT ANY FEAR OF WRONGDOING. WHY IS THIS? WHAT CAN BE DONE? WELL, ANYWAY DUE TO THE DAMAGES CAUSED BY THE DEFENDANTS AND THE PEOPLE TAKING THE MONEY TO HARM US, THE PLAINTIFFS ARE ENTITLED TO THE AWARD OF DAMAGES, AND COMPENSATORY DAMAGES, AND PUNITIVE DAMAGES , AND MEDICAL DAMAGES AND ANY OTHER DAMAGES THAT THE COURT MAY DECIDE. AND ANY OTHER RELIEF AS THE COURT DEEMS JUST AND PROPER!

PRAYER FOR RELIEF

WHEREFORE, PLAINTIFF PRAYS FOR JUDGEMENT AGAINST THE DEFENDANTS AS FOLLOWS:

A. THE PLAINTIFF DEMANDS JUDGEMENT AGAINST THE DEFENDANTS AND

AWARDING DAMAGES SUSTAINED BY THE PLAINTIFF AS A RESULT OF THE VIOLATIONS AND BREECHES OF LAWS AND RULES. AND ASKS THE COURT TO STOP THE DEFENDANTS FROM THE CONTINUING RACKETEERING AND CIVIL CRIMES.

B. FOR THE AWARDING OF THE PLAINTIFFS DAMAGES, INJUNCTIVE RELIEF, DECLARATORY RELIEF, FEES AND COSTS OF THE SUIT.

C. THE AWARDING OF DAMAGES SUSTAINED AS A RESULT OF THE CIVIL AND CRIMINAL RACKETEERING AND TORTIOUS INFERENCE.

D. AWARDING COMPENSATORY DAMAGES AND TRBLRE DAMAGES, AND COSTS AND FEES UNDER THE RICO STATUE.

THE AWARDING OF DAMAGES FOR MEDICAL BILLS, EMOTIONAL BILLS, AND FOR PAST AND FUTURE MEDICAL BILLS FOR PROBLEMS CAUSED BY THE DEFENDNATS IN THIER CONSPIRED CRIMINAL AND CIVIL RACKETEERING ENTERPISE.

e. FOR A WRIT OF ATTACHMENT, WRIT OF GARNISHMENT, WRIT OF POSSESSION ATTACHING, AND REAL PROPERTY OWNED BY THE DEFENDANTS.

H. DAMAGES EXCEED \$30 MILLION DOLLARS.

F. FOR POST JUDGEMENT INTEREST ON THE INTIRE JUDGEMENT TO BE DETERMINED AT A JURY TRIAL, AT THE LEGAL RATE.

G. FOR SUCH OTHER AND FUTHER RELIEF AS THE COURT MAY DEEM APPROPRIATE IN THE PREMISES.

DONE AND DATED THIS 19th DAY OF JANUARY, 2016.

BY PRO-SE PLAINTIFF DENNIS KERR Dennis Kerr

BY PRO-SE PLAINTIFF TERRY KERR Terry Kerr

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY THAT A COPY OF THE AMENDED COMPLAINT WAS SENT TO DEFENDANT BANK OF AMERICA AT THE FOLLOWING ADDRESS:  
AKERMAN LLP, 1160 TOWN CENTER DRIVE, SUITE 330 LAS VEGAS, NEVADA

89144 ON THIS 19th DAY OF JANUARY, 2016. THE OTHER DEFENDANTS  
WILL BE SERVED BY A PROCESS SERVER WITH THE SUMMONS AND THE  
COMPLAINT AS SOON AS POSSIBLE. THANK YOU FOR YOUR TIME AND  
CONCERN IN THIS MATTER.

DONE AND DATED THIS 19TH DAY OF JANUARY, 2016.

BY PRO-SE PLAINTIFF DENNIS KERR Dennis Kerr  
BY PRO-SE PLAINTIFF TERRY KERR Terry Kerr